FILED ENTERED
LODGED RECEIVED
MAR 29 2016 ST
AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

JOEL LAVEL ROBINSON
J.R.'S LEGAL SERVICES,
Plaintiff(s)

WILLIAM MCCOOL
U.S. DISTRICT CLERK'S OFFICE
Defendant(s),

16-CV-00441 MAT

CIVIL RIGHTS COMPLAINT
~~UNDER U.S.C. § 1983~~ JR

Parties to this Complaint:

Plaintiff's Name, Address and Phone Number	JOEL LEVEL ROBINSON J.R.'S LEGAL SERVICES P.O. BOX 88832 SEATTLE, WA 98138-2832 206-718-8203
Defendant's Name, Address and Phone Number	WILLIAM MCCOOL U.S. DISTRICT COURT CLERK'S OFFICE 700 STEWART STREET SUITE 2310 SEATTLE, WA 98101 206-370-8400
Defendant's Name, Address and Phone Number	ANNETTE HAYES UNITED STATES ATTORNEY'S OFFICE 700 STEWART STREET SUITE 5220 SEATTLE, WA 98101-1271
Defendant's Name, Address and Phone Number	JUDGE RONALD B. LEIGHTON UNITED STATES COURT HOUSE 1717 PACIFIC AVENUE ROOM 3100 TACOMA, WA 98402-3200 253-882-3840

SEA77283 8/16

Previous Lawsuits:

Have you brought any other lawsuits in federal court in the United States:? **NO**

Describe the lawsuit:

Parties to this previous lawsuit:

Plaintiff(s)	**NONE**
Defendant(s)	**NONE**
Court and Name of District	**NONE**
Docket Number	**NONE**
Assigned Judge	**NONE**
Disposition	**NONE**
Approximate filing date of lawsuit	**NONE**
Approximate date of disposition	**NONE**

I. NATURE OF ACTION:

1.1 This is a lawsuit on behalf of the plaintiff, "Joel Lavel Robinson, J.R.'s Legal Services, whose "Civil Rights" are currently being violated with each day.

2.1 Background of Action:

In November of 1995, the plaintiff, in this 1983 civil lawsuit, was in Airway Heights Correctional Center doing time for drug charges. That same year, under a pilot

program under then Governor Mike Lowry, the plaintiff, Joel L. Robinson, enrolled in a paralegal class and in 1997 he received his A.A. Degree in Criminal Law.

In 2005, the plaintiff, along with 15 other prisons, all formed a law group of jail house lawyers called "The Crime Dog Law Group, which included some of the top "jail house lawyers" from five (5) different Washington State prisons. In 2007, the group voted 14 to 1 to name Joel Robinson as the top "jail house lawyer" and gave him the name as The Crime Dog. Also note: Mr. Robinson wrote the law book called "The Crime Dog Cite Book" while he was still in prison.

Released from prison in 2008, the plaintiff, Joel L. Robinson, on orders and directions from God, turned his life around. No more selling drugs, no more fast women, and no more of the street/night life. He will work for the Lord and the Lord only. "J.R.'s Legal Services."

Mr. Robinson offers his services to all bar attorneys and pro-se defendants who are fighting criminal prosecution from coast to coast state cases, federal case appeals, lawsuits, etc.

Currently, on a confidential basis, Mr. Robinson paralegals for some 25 criminal attorneys. His paralegal law services is now known in all fifty states. Mr. Robinson's law book is the #1 choice law book by all criminal defendants.

In February of 2011, even U.S. President, the Honorable Barrack Obama, endorsed Mr. Robinson's law book. See: herein Appendix A-1, "Crime Dog Law Book." See: Mr. Robinson's website at www.jrslegalservices.com. Appendix A-2 and A-3.

II. STATEMENT OF CLAIM:

3.1 On February 2nd, 2016, the plaintiff, Joel Robinson, received a phone call from Mario H. Escobedo-Pajarito from the Federal Hold Center in SeaTac, Washingon. Mr. Escobedo-Pajarito stated that he was not happy with his attorney, that he had read Mr. Robinson's law book, "The Crime Dog Cite Book," and that, yes, he was going pro-se on his case. Mr. Robinson told Mr. Mario Escobedo-Pajarito that yes, 100%, he would be happy to help him as each month Mr. Robinson helps approximatley twenty to thirty pro-se inmates. See: Appendix A-1.

On February 19th, 2016, Mr. Escobedo-Pajarito's standby counsel called him to say that if Mr. Escobedo-Pajarito was to go pro-se that the Hon. Judge Ronald B. Leighton wanted to know "who" his paralegal" his legal investigators would be. See: Herein Appendix B-1.

On February 25th, 2016, the defendant, Mario Escobedo-Pajarito, did go pro-se, but U.S. District Court Judge Ronald B. Leighton, made an outradeous ruling that if the defendant was to choose to go pro-se that the "paralegal," Mr. J.R. Robinson, would be barred from the case as Mr. Escobedo-Pajarito's paralegal.

But on March 10, 2016, Mr. J.R. Robinson was shocked to learn that a big sign was posted on the wall of the U.S. District Court clerk's office which stated that Mr. J.R. Robinson is not to be able to file any motion for or from the pro-se defendant, Mario Escobedo-Pajarito. This is shocking because if you look at each motion Mr. J.R. Robinson's name does not appear anywhere on the documents but the court clerk refused to accept the documents. See: Appendix C-1 and Appendix D-1. The court clerk said that it was ordered by Judge Ronald B. Leighton, the defendant's judge. This is a high level of gross miscarriage of justice in the wheels of law.

The defendant was on March 10th, 2016 "pro-se." Yes, for free, Mr. J.R. Robinson was asked by the pro-se defendant, as on any given month is the paralegal for some 20 bar attorneys and some 30 pro-se defendants each month. By affidavit of mailing or personal services, Mr. Robinson files hundreds of motions in state and federal court houses for bar attorneys and pro-se defendants. Once a defendant goes pro-se, the court cannot bar a pro-se defendant from having (1) his own personal paralegals, (2) his own personal legal investigators, (3) his own personal expert services or whatever is necessary to an adequate defense.

On March 20th, 2016, the defendant, Mario Escobedo-Pajarito, pro-se, moved the U.S. District Court for a full dismissal of his case under Fifth and Sixth Amendment violations. See: Herein Appendix E-1. The two motions were not typed or prepared by Paralegal J.R. Robinson.

Note: Just for the record, Mr. J.R. Robinson has offered his time to the defendant for free under the U.S. Constitution's 1st Amendment of the right of the freedom of exercise.

This is wrong. No court can make such rulings. This violates Mr. Robinson's civil rights. It violates Mr. Robinson's First Amendment rights prohibiting him the freedom of exercise as well as the 14th Amendment.

Also note: There are three other people helping the defendant, Mr. Mario Escobedo-Pajarito. But why has the court seen fit to bar Mr. Robinson only? This is a major violation of Mr. Robinson's 14th Amendment of the freedom to be treated equally. Mr. Robinson has also asked the A.C.L.U., the N.A.A.C.P. and M.S.N.B.C. to view this case and this outrageous ruling as a violation of the U.S. Constitution. He has also asked that a full investigation be conducted on "Civil Rights" violations by this court to the U.S. Justice Department in Washington, D.C.

Mr. Robinson has suffered dearly. His good name has been dragged in the mud by posting his photo on the clerk's wall. This has brought Mr. Robinson much pain and suffering as if he were a criminal on the F.B.I.'s "Ten Most Wanted" list.

This is wrong and these are Civil Rights violations. All parties involved should be terminated from their jobs as public servants. Furthermore, the poster of Mr. Robinson should be immediately removed from all U.S. clerk's offices.

III. RELIEF:

(1) The plaintiff, Joel Lavel Robinson, would ask that this court order the U.S. District court clerk, "William McCool," to have all posters of Mr. Robinson's photo removed from all walls of his clerk's offices.

(2) The plaintiff, Mr. Joel Lavel Robinson, would ask that this court order the outrageous ruling by Judge Ronald B. Leighton be reversed as unconstitutional and in a violation of Mr. Robinson's civil rights.

(3) The plaintiff, Mr. Joel Lavel Robinson, would ask that this court order in pain and suffering the amount of Ten Thousand Dollars ($10,000) to be paid by the U.S. clerk's office.

(4) The plaintiff, Mr. Joel Lavel Robinson, would ask that this court order an additional Ten Thousand Dollars($10,000) be paid by Hon. Judge Ronald B. Leighton for making such a ruling for a total of Twenty Thousand Dollars ($20,000) for civil rights violations.

Respectfully submitted this 27th **day of** March**, 2016.**

[signature]

JOEL LAVEL ROBINSON
P.O. BOX 88832
SEATTLE, WA 98178
PHONE: 206-718-8203

I declare under penalty of perjury that the foregoing is true and correct.

3-27-2016
Date

[signature]
Signature of Plaintiff